

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

TIARA ENGLE and PORTNER	) CIVIL NO. 04 00256 (SOM) (BK)
ORTHOPEDIC REHABILITATION,	) (Other Civil Action)
INCORPORATED,	)
	) PLAINTIFF'S MOTION FOR AN
Plaintiffs,	) ORDER COMPELLING CLIFFORD LAU,
	) M.D. TO THOROUGHLY COMPLY WITH
vs.	) SUBPOENA DUCES TECUM; TO
	) COMPLY WITH SUBPOENA TO ATTEND
	) AN ORAL DEPOSITION; AND FOR
	) AWARD OF REASONABLE EXPENSES
LIBERTY MUTUAL FIRE INSURANCE	)
COMPANY; JOHN DOES 1-10; JANE	)
DOES 1-10; DOE CORPORATION 1-	)
10; DOE PARTNERSHIPS 1-10; ROE	)
"NON-PROFIT" CORPORATIONS 1-10;	)
and ROE GOVERNMENTAL ENTITIES	)
1-10,	) Trial Week: September 11,
	) 2007
Defendants.	)
	)
	)
	)
	)
	)
	)


**PLAINTIFF'S MOTION FOR AN  
ORDER COMPELLING CLIFFORD LAU, M.D. TO  
THOROUGHLY COMPLY WITH SUBPOENA DUCES TECUM;  
TO COMPLY WITH SUBPOENA TO ATTEND AN ORAL  
DEPOSITION; AND FOR AWARD OF REASONABLE EXPENSES**

Plaintiff hereby moves this Honorable Court for an order compelling Clifford Lau, M.D. to thoroughly comply with the subpoena duces tecum served upon his office on October 19, 2006 by searching for and producing all records described therein, and to appear for an oral deposition during business hours at Plaintiff's counsel's office as

will be designated in a subpoena, with no conditions other than payment to Dr. Lau of the witness fees and mileage accorded by court rules and/or statute. Due to Dr. Lau's complete lack of good faith in responding to these discovery issues to date, an award of reasonable expenses is also requested.

This motion is brought pursuant to F.R.C.P. Rule 37, and is based upon the attached memorandum in support of motion, affidavit, and exhibits, and the record and files herein.

DATED: Honolulu, Hawaii, March 6, 2007.

  
\_\_\_\_\_  
ROY K. S. CHANG  
HARVEY M. DEMETRAKOPOULOS  
Attorneys for Plaintiff